

**SCHONBRUN SEPLOW HARRIS
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Co-Lead Class Counsel.

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UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA - SOUTHERN DIVISION

IN RE: TOLL ROADS LITIGATION

PENNY DAVIDI BORSUK; DAVID
COULTER; EBRAHIM E. MAHDA;
TODD QUARLES; TODD
CARPENTER; LORI MYERS; DAN
GOLKA; and JAMES WATKINS on
behalf of themselves and all others
similarly situated,

Plaintiffs,

vs.

FOOTHILL/EASTERN
TRANSPORTATION CORRIDOR
AGENCY; SAN JOAQUIN HILLS
TRANSPORTATION CORRIDOR
AGENCY; ORANGE COUNTY
TRANSPORTATION AUTHORITY;
3M COMPANY; BRiC-TPS LLC;
RHONDA REARDON; MICHAEL
KRAMAN; CRAIG YOUNG; SCOTT
SCHOEFFEL; ROSS CHUN;
DARRELL JOHNSON; LORI
DONCHAK; COFIROUTE USA, LLC;
and DOES 3-10; inclusive,

Defendants.

Case No: 8:16-cv-00262-ODW(ADSx)

Hon. Otis D. Wright II

**PLAINTIFF'S NOTICE OF MOTION
AND UNOPPOSED MOTION FOR
PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

Date: April 23, 2021,

Time: 11:00 a.m.

Location: Judicate West

55 Park Plaza, Suite 400

Irvine, CA 92614

Special Master: Hon. Andrew J. Guilford (ret.)

*[Filed Concurrently with Memorandum,
Declarations and Proposed Order]*

1 **TO ALL PARTIES AND THEIR COUNSEL OF RECORD:**

2 **PLEASE TAKE NOTICE** that on **April 23, 2021, at 11:00 a.m.**, or as soon
3 thereafter as the matter may be heard, at Judicate West located at 55 Park Plaza Suite
4 400, Irvine, CA 92614 before the Honorable Andrew J. Guilford (ret.), Plaintiff Dan
5 Golka will and hereby does move for an order granting preliminary approval of the
6 class Settlement between himself and Defendants Orange County Transportation
7 Authority (“OCTA”), Darrell Johnson, Lori Donchak and Cofiroute USA, LLC
8 (“Cofiroute”). **Please take notice that the hearing will be held remotely via**
9 **Zoom.**

10 This notice and motion is made pursuant to Federal Rule of Civil Procedure
11 23(e) and on the grounds that the proposed Settlement is fair, reasonable and
12 adequate and in the best interests of the class. The motion is unopposed by
13 Defendants OCTA and Cofiroute, who are parties to the proposed Settlement.

14 This motion is based upon this notice and motion; the Memorandum of Points
15 and Authorities submitted herewith; the attached Declarations of Helen I. Zeldes and
16 Cameron R. Azari and attached exhibits thereto; the other records and pleadings filed
17 in this action; and upon such other documentary and oral evidence or argument as may
18 be presented to the Court at the hearing of this motion.

19
20 Date: April 12, 2021

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23 By: /s/ Helen I. Zeldes
Helen I. Zeldes

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CO-LEAD CLASS COUNSEL

1 Date: April 12, 2021

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CO-LEAD CLASS COUNSEL

10 Date: April 12, 2021

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CO-LEAD CLASS COUNSEL

1 Pursuant to Local Civil Rule 5-4.3.4(a)(2)(i), the above-listed filing attorney
2 certifies that all other signatories listed, and on whose behalf this filing is submitted,
3 concur in this filing's content and have authorized its filing.

4
5 Date: April 12, 2021

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HELEN I. ZELDES (220051)

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8 By: /s/ Helen I. Zeldes
Helen I. Zeldes

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10 ***CO-LEAD CLASS COUNSEL***
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